

Hughes
Hubbard
& Reed

Hughes Hubbard & Reed LLP
One Battery Park Plaza
New York, New York 10004-1482
Telephone: +1 (212) 837-6000
Fax: +1 (212) 422-4726
hugheshubbard.com

Marc A. Weinstein
Partner
Direct Dial: +1 (212) 837-6460
Direct Fax: +1 (212) 299-6460
marc.weinstein@hugheshubbard.com

March 16, 2020

BY ECF

Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: In re Customs and Tax Administration of the Kingdom of Denmark
(Skatteforvaltningen) Tax Refund Scheme Litigation, 18-md-2865 (LAK)

Dear Judge Kaplan:

This letter motion relates to the following cases in the MDL: 18-cv-05053; 18-cv-05374; 18-cv-08655; 18-cv-09797; 18-cv-09836; 18-cv-09837; 18-cv-09838; 18-cv-09839; 18-cv-09840; 18-cv-09841; 18-cv-10100.

We write on behalf of Plaintiff Skatteforvaltningen (“SKAT”) with the consent of Third Party Defendant ED&F Man. Pursuant to the Court’s direction on March 5, 2020, the parties have engaged in a constructive dialogue in an attempt to resolve their differences concerning SKAT’s US discovery requests. While those differences are not yet resolved, the parties have made substantial progress and are of the view that continued dialogue would be more fruitful in at least narrowing, if not resolving entirely, the remaining differences. Accordingly, the parties respectfully request that any briefing required on the issues be postponed to March 23.

Respectfully submitted,

/s/ Marc A. Weinstein
Marc A. Weinstein

cc: All counsel of record (via ECF)